

1 AMIR NASSIHI (SBN 235936)
2 anassihi@shb.com
3 **SHOOK, HARDY & BACON LLP**
4 555 Mission Street, Suite 2300
5 San Francisco, CA 94105
6 Tel: (415) 544-1900 | Fax: (415) 391-0281

7 NAOKI KANEKO (SBN 252285)
8 nakaneko@shb.com
9 ARLENE H. BAKIRCI (SBN 342772)
10 abakirci@shb.com
11 **SHOOK, HARDY & BACON LLP**
12 5 Park Plaza, Suite 1600
13 Irvine, CA 92614-2456
14 Tel: (949) 475-1500 | Fax: (949) 475-0016

15 Attorneys for Defendants
16 FORD MOTOR COMPANY AND
17 FOX HILLS AUTO, INC. DBA
18 AIRPORT MARINA FORD

19 **IN THE UNITED STATES DISTRICT COURT**
20 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

21 FRANCISCO GARCIA PANDO AKA
22 FRANCISCO G PANEDA &
23 LOURDES CHAVEZ AKA CHAVES
24 LOURDES,

25 Plaintiffs,

26 vs.

27 FORD MOTOR COMPANY, a
28 Delaware Corporation, FOX HILLS
29 AUTO, INC., a California Stock
30 Corporation DBA Airport Marina Ford
31 and DOES 1 through 10, inclusive,

32 Defendants.

33 CASE NO. 2:25-cv-04118

34 Magistrate Judge:
35 *The Hon. Alicia G. Rosenberg*

36 ~~[PROPOSED] JUDGMENT RE~~
37 ~~OFFER OF JUDGMENT~~
38 ~~PURSUANT TO FEDERAL RULES~~
39 ~~OF CIVIL PROCEDURE, RULE 68~~

40 Action Filed: 7/20/2023

41 Trial Date: Not Set

42 **[PROPOSED] JUDGMENT**

43 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

44 Plaintiffs Francisco Garcia Pando aka Francisco G Paneda and Lourdes Chavez
45 aka Chaves Lourdes (“Plaintiffs”), accepted Defendant Ford Motor Company’s
46 (“Ford”) Offer of Judgment pursuant to Fed. R. Civ. P. 68.

1. Accordingly, the Court enters JUDGMENT in favor of Plaintiffs in the amount of \$145,000.00 pursuant to the terms of the Rule 68 Offer.

3 2. Plaintiffs shall reserve the right to petition the Court for an award of
4 reasonably and actually incurred attorney fees and costs recoverable pursuant to
5 California Code of Civil Procedure Section 1794(d). Any such motion shall be filed
6 no later than 14 days after entry of judgment. In ruling on Plaintiffs' fee/cost
7 motion(s), the attorneys' fees, expenses, and costs amount shall be calculated as if
8 Plaintiffs were found to have prevailed in this action under section 1794(d) of the
9 California Code of Civil Procedure as of the date of this offer of judgment. Ford
10 expressly reserves all defenses to Plaintiffs' fee/costs motion(s) and any award
11 thereon. Ford will pay the amounts determined by the Court within 30 days after entry
12 of the award unless either party has filed a notice of appeal.

13 3. Plaintiffs will deliver the Subject Vehicle to Ford on a date, time, and
14 place mutually agreeable to the parties and no later than seventy-five (75) days after
15 Plaintiffs' counsel has accepted Ford's offer and has provided the documents required
16 to transfer title.

19 | DATED: June 13, 2025

Alicia G. Rosenberg

THE HONORABLE ALICIA G. ROSENBERG
JUDGE OF THE UNITED STATES DISTRICT COURT